

## Robert W. Sadowski PLLC

As noted in Rule 5 of this Court's Individual Practices, "any redaction or sealing of a court filing must be narrowly tailored to serve whatever purpose justifies the redaction or sealing and must otherwise be consistent with the presumption in favor of public access to judicial documents." The Court will not approve the wholesale indiscriminate sealing of documents.

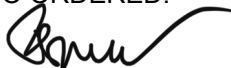
The Clerk of the Court is respectfully directed to strike the following entries as filed improperly: (1) Doc 68; (2) Doc. 69; (3) Doc. 70; (4) Doc. 71; and (5) Doc. 72. The motion sequence pending at Doc. 75 is denied without prejudice to renew.

Should they be so advised, Movants shall re-file their motion forthwith in accordance with the procedure outlined in Rule 5 of this Court's Individual Practices. In the re-filing, Movants must file each exhibit as a separate attachment (i.e., Doc. 71-1, Doc. 71-2, etc.).

Defendants are directed to destroy all copies of the memorandum of law filed at Doc. 70 and to disregard the information contained therein.

The Clerk of the Court is respectfully directed further to terminate the motion sequence pending at Doc. 76.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: New York, New York  
December 10, 2020

December 9, 2020

*Center et al.*, Civ. No.: 20-cv-00556 (PKC)

Tahira Mirza. We write pursuant to the Court's relief sought by an Amended Notice of Motion to Plaintiff and to File Memorandum of Law, accompanying Exhibits under Seal, which was filed original Motion papers, in those papers, we per seal the Declaration of Robert W. Sadowski, ed under seal on ECF. On December 2, 2020, did not file the Memorandum of Law under seal,

We have been informed by counsel for the Plaintiff who was retained to address our motion for charging and retaining liens that the Memorandum of Law also contains attorney client privileged communication. To ensure to fully preserve Plaintiff's privileged communications with counsel, we agreed with Plaintiff's counsel to amend our notice of motion and request that not only that the Declaration of Robert W. Sadowski and its accompanying exhibits be ordered filed under seal, but that all filings except the Notice of Motion be ordered filed under seal. In addition, we further request the Court remove the publicly filed Memorandum of Law from the docket and order that it be sealed. In addition, we respectfully request that the Court direct Defendants to destroy any copies of the Memorandum of Law and

direct Defendants to disregard and not use any information contained in the Memorandum of Law.

Respectfully submitted,

s/Robert W. Sadowski  
Robert W. Sadowski